

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DALE KAMINSKI,

Plaintiff,

v.

BAYVIEW CAPITAL PARTNERS, LLP,
TONKA BAY CO-INVESTMENT
PARTNERS LLC, MOTION INDUSTRIES,
INC., MOTION MERGER SUB, LLC,
LINDQUIST & VENNUM LLP, ABC
COMPANIES 1-100, and JOHN DOES 1-100,

Defendants.

Case No. 2:13-cv-07892-WJM-MF

**[PROPOSED] ORDER
EXTENDING ANSWER DEADLINE**

WHEREAS Plaintiff Dale Kaminiski and Defendants Bayview Capital Partners, LLP, Tonka Bay Co-Investment Partners LLC, Motion Industries, Inc., Motion Merger Sub, LLC, and Lindquist & Venum LLP (the “Parties”) have reached an agreement to settle this litigation (the “Agreement”); and

WHEREAS the Parties are presently in the process of collecting the signatures necessary to memorialize the Agreement; and

WHEREAS the deadline for Defendants to file their answers (“Answer Deadline”) is presently March 20, 2014; and

WHEREAS the Parties have all consented to a one-week extension of the Answer Deadline in order to memorialize the Agreement;

WHEREAS it otherwise appears that there is good cause to extend the Answer Deadline, and that granting such an extension will foster settlement and serve the interests of justice;

IT IS on this ____ day of _____, 2014,

ORDERED that:

1. The Parties' request to extend the Answer Deadline to March 27, 2014 is hereby
GRANTED.

IT IS SO ORDERED.

The Honorable William J. Martini, U.S.D.J.